

Exhibit 4

Shirley Gibson

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF MONTANA
3 BILLINGS DIVISION
4 TRACY CAEKAERT, and
5 CAMILLIA MAPLEY,
6 Plaintiffs, Case No. CV-20-52-BLG-SPW
7 vs.
8 WATCHTOWER BIBLE AND TRACT
9 SOCIETY OF NEW YORK, INC.,
10 WATCH TOWER BIBLE AND
11 TRACT SOCIETY OF
12 PENNSYLVANIA, and BRUCE
13 MAPLEY SR.,
14 Defendants.
15 WATCHTOWER BIBLE AND TRACT
16 SOCIETY OF NEW YORK, INC.,
17 Cross Claimant,
18 BRUCE MAPLEY, SR.,
19 Cross Defendant.
20 _____
21 ARIANE ROWLAND, and JAMIE
22 SCHULZE Cause No. CV 20-59-BLG-SPW
23 Plaintiff,
24 vs.
25 WATCHTOWER BIBLE AND TRACT

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1 SOCIETY OF NEW YORK, INC.
2 and WATCH TOWER BIBLE AND
3 TRACT SOCIETY OF
4 PENNSYLVANIA,
5 Defendants.

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9 VIDEOCONFERENCE/VIDEOTAPED DEPOSITION
10 UPON ORAL EXAMINATION OF
11 SHIRLEY GIBSON
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13 BE IT REMEMBERED, that the
14 videoconference/videotaped deposition upon oral
15 examination of Shirley Gibson, appearing at the
16 instance of the Plaintiffs, was taken at 800 North
17 Last Chance Gulch, Suite 101, Helena, Montana, on
18 Thursday, April 14, 2022, beginning at the hour of
19 9:07 a.m., pursuant to the Federal Rules of Civil
20 Procedure, before Mary R. Sullivan, Registered
21 Merit Reporter, Certified Realtime Reporter, and
22 Notary Public.
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1 A. He was going to handle it.

2 Q. Okay. So he didn't say he was going to
3 tell the authorities.

4 A. No, but I thought that's what he would
5 do.

6 Q. I see. And if he had done -- Let's say
7 he -- Let's say he told you not to, did you
8 understand you could go to the authorities if you
9 wanted to?

10 A. Yeah. He didn't tell me I couldn't, but
11 I assumed he was going to take care of it.

12 Q. Okay.

13 A. And I should have done it.

14 Q. When did you -- When did you follow up
15 with him on that?

16 A. I never had any contact with -- I mean, I
17 never had any more conversations with him or
18 anybody else about it after that.

19 Q. Okay. Did other people in the
20 congregation know that Gunner had molested Tracy
21 and Ronda?

22 A. Yes.

23 Q. How did they find out about it?

24 A. Same way I did, I guess. I never asked
25 them.

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1 work, so he was going to find another one. He
2 said he would call and talk to them.

3 Q. And -- And was it because you had
4 received some legal paperwork? What was the
5 reason why you wanted to call?

6 A. I had been served with the deposition, so
7 I --

8 Q. Aha.

9 A. -- called and talked to him.

10 Q. Okay. So you got -- you got this notice
11 to appear here today, and you wanted to know what
12 to do with it.

13 A. Yes.

14 Q. And you never heard back from anyone at
15 Watchtower.

16 A. Not from there or Ray Sewell.

17 Q. Okay. As -- As one of Jehovah's
18 Witnesses, is there any aspect of your worship
19 that is not voluntary?

20 A. No.

21 Q. Is all of it voluntary?

22 A. Yes.

23 Q. Can the elders stop you from doing
24 something?

25 A. No.

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1 Q. Can the elders make you do something?

2 A. No.

3 Q. I have no further questions. I want to
4 defer to Chris. Thank you so much.

5 MR. SWEENEY: I only have a -- We'll take
6 a break.

7 THE VIDEOGRAPHER: Let's go off the
8 record. It's 1:54.

9 (Recess taken from 1:54 p.m. to
10 1:59 p.m.)

11 THE VIDEOGRAPHER: We're back on the
12 record now. It's 1:59 p.m.

13 EXAMINATION

14 BY MR. SWEENEY:

15 Q. Shirley, my name is Chris Sweeney. I
16 represent the other defendant in this matter, the
17 Watch Tower Bible and Tract Society of
18 Pennsylvania, and I just have a few questions for
19 you. I wanted to start by looking at your
20 affidavit again and talking to you about how this
21 came about.

22 I understand that this affidavit was
23 requested by the investigator Todd. Do I have
24 that right?

25 A. Yes. Yes.

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DEPONENT'S CERTIFICATE

I, SHIRLEY GIBSON, the deponent in the foregoing deposition, DO HEREBY CERTIFY, that I have read the foregoing pages of typewritten material and that the same is, with any changes thereon made in ink on the corrections sheet, and signed by me, a full, true and correct transcript of my oral deposition given at the time and place hereinbefore mentioned.

SHIRLEY GIBSON, Deponent.

Subscribed and sworn to before me this
day of , 2022.

PRINT NAME:

Notary Public, State of

Residing at:

My commission expires:

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Tract Society of New York

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C E R T I F I C A T E

STATE OF MONTANA)
 : SS
COUNTY OF MISSOULA)

I, Mary R. Sullivan, RMR, CRR, and Notary Public for the State of Montana, residing in Missoula, do hereby certify:

That I was duly authorized to and did swear in the witness and report the deposition of SHIRLEY GIBSON in the above-entitled cause; that the foregoing pages of this deposition constitute a true and accurate transcription of my stenotype notes of the testimony of said witness, all done to the best of my skill and ability; that the reading and signing of the deposition by the witness have been expressly reserved.

I further certify that I am not an attorney nor counsel of any of the parties, nor a relative or employee of any attorney or counsel connected with the action, nor financially interested in the action.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my notarial seal on April 27, 2022.

Mary Sullivan

